

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

IN RE:)	CHAPTER 11
)	
OIL PATCH TRANSPORTATION, INC.,)	CASE NO. 17-80152
)	
Debtor.)	

MOTION FOR CONTINUANCE OF AUGUST 18, 2017 HEARING

COMES NOW, SunTrust Equipment Finance and Leasing Corp. (“SunTrust”), by and through its undersigned counsel of record, and hereby requests a continuance of its Motion for Relief from the Automatic Stay, or in the Alternative, to Compel Adequate Protection under Certain Security Agreements (the “Motion”) [Dkt. 39], which is currently scheduled for hearing on August 18, 2017 at 2:00 p.m. In support thereof, SunTrust states as follows:

1.

As reported by the Debtor in its Emergency Motion to Continue and Expand Use of Cash Collateral and Provide Adequate Protection [Dkt. 63], SunTrust has reached an agreement with the Debtor in settlement of its Motion. Brazoria’s County’s objection, however, remains outstanding.

2.

Counsel for SunTrust and counsel for Brazoria County are currently discussing the disputed issues. SunTrust requests a continuance of the August 18, 2017 hearing to allow the parties additional time to continue settlement discussions and, if possible, reach an agreement without the need for a hearing.

3.

Counsel for SunTrust requests that the continued hearing be held on or after the hearing on Wells Fargo Equipment Finance, Inc.'s Motion for Entry of Agreed Order Conditioning Automatic Stay [Dkt. 75] and Brazoria County's objection thereto [Dkt. 77]. Counsel for Brazoria County does not oppose a continuance.

4.

This Motion for Continuance is made for good cause and not for the purpose of delay.

WHEREFORE, SunTrust respectfully requests that this Court enter an Order continuing the August 18, 2017 hearing on the Motion and for such other and further relief as this Court deems just and appropriate.

This 14th day of August, 2017.

/s/ Sameer K. Kapoor
SAMEER K. KAPOOR
Georgia Bar No. 407525
*Admitted *Pro Hac Vice*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing **Motion for Continuance of August 18, 2017 Hearing** was sent electronically via this Court's CM/ECF System upon registered users and/or via First Class U.S. Mail, postage prepaid, to those parties listed below and on the attached Exhibit "A" on this the 14th day of August, 2017.

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This 14th day of August, 2017.

/s/ Sameer K. Kapoor
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Exhibit "A"

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Carol Stream, IL 60197

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c/o Satander Lawsuit
421 West 3rd Street
Suite 910

Evergreen Tank Solutions
Dept 459
P.O. Box 4869
Houston, TX 77210

Rapid Capital Finance, LLC
Jaffe & Asher, LLP
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New York, NY 10016

United States Treasury
P.O. Box 105572
Atlanta, Georgia 30348

Forward Financing, LLC
36 Bromfield Street
Suite 210
Boston, MA 2108

AUS Central
Lockbox
P.O. box 731676
Dallas, TX 75373

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111 E. Locus Ste 100A
Angleton, TX 77515

XL Insurance
21255 Network Place
Chicago, IL 60673

Commerce and Industry Insurance Company
5429 LBJ Freeway, Suite 700
Dallas, TX 75240

TCEQ
P.O. Box 13087
Austin, TX 78711

Fleetmatch USA, LLC
P.O. Box 347472
Pittsburgh, PA 15251

Waste Management of Texas, Inc.
P.O. Box 660345
Dallas, TX 75266

Rene's Tires & Repair
7926 Glenview Dr.
Houston, TX 77061

Chevron Diesel Advantage
P.O. Box 70887
Charlotte, NC 28272

Regions Insurance
1808 Hwy 190 West, Suite B
Deridder, LA 7634

Jesse P. Taylor Oil Co.
3701 No. Sylvania At Long
Fort Worth, TX 76137

S&D Services, Inc.
P.O. Box 656
Boling, TX 77420

Texas Workforce Commission
101 E. 15th Street
Austin, TX 78778

Whitener Enterprises, Inc.
P.O. Box 1077
Conroe, TX 77305